

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
)	Case No. 22-11068 (JTD)
FTX TRADING LTD., <i>et al.</i> , ¹)	
)	(Jointly Administered)
Debtors.)	
)	Re: Doc. Nos. 22165 and 23178

**NOTICE OF WITHDRAWAL OF PHILADELPHIA INDEMNITY INSURANCE
COMPANY'S LIMITED OBJECTION AND RESERVATION OF RIGHTS TO THE
FIRST AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF
FTX TRADING LTD. AND ITS DEBTOR AFFILIATES**

COMES NOW Philadelphia Indemnity Insurance Company (“Philadelphia”), by and through the undersigned counsel, and hereby gives notice of its withdrawal of *Philadelphia Indemnity Insurance Company’s Limited Objection and Reservation of Rights to the First Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. No. 23178] (the “Limited Objection”) for the reasons set forth herein. The Debtors and Philadelphia have reached agreement on language resolving the Limited Objection, and that language is included in the Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading LTD. and its Debtor Affiliates [D.I. No. 26034-1] (the “Proposed Confirmation Order”). Subject to the inclusion of the agreed upon language from the Proposed Confirmation Order in this Court’s Order confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading LTD. and its Debtor Affiliates,

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Philadelphia hereby withdraws the Limited Objection without prejudice to any other rights, claims and interests in this case.

Respectfully submitted,

**MCELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

Dated: October 1, 2024

/s/ Gaston P. Loomis

Gary D. Bressler, Esq. (#5544)
Gaston P. Loomis, Esq. (#4812)
300 Delaware Avenue, Suite 1014
Wilmington, Delaware 19801
Telephone: (302) 300-4515
Email: gbressler@mdmc-law.com
gloomis@mdmc-law.com

-and-

Scott C. Williams (admitted *pro hac vice*)
S. Marc Buchman (admitted *pro hac vice*)
MANIER & HEROD, a Tennessee professional
corporation
1201 Demonbreun Street, Suite 900
Nashville, Tennessee 37203
Telephone: (615) 244-0030
Email: swilliams@manierherod.com
mbuchman@manierherod.com

*Attorneys for Philadelphia Indemnity Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2024, the foregoing was served electronically via the Court's ECF System on the parties requesting to receive electronic notices in this case.

**MCELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

/s/ Gaston P. Loomis

Gaston P. Loomis, Esq.